

From: [Blake, Leslie](#)
To: ["Charles.Ahrens@ghd.com"](mailto:Charles.Ahrens@ghd.com)
Cc: [Gahala, Amy](#); [Tom Frost](#); [Mark Bilut \(mbilut@mwe.com\)](mailto:Mark.Bilut@mwe.com); kelli.taffora@rexnord.com; Ron.Frehner@ghd.com; cctofiging@craworld.com; [Conrath, Brian A.](#); [Krueger, Thomas](#); [Dawson, Matthew](#)
Subject: RE: Rexnord Well Abandonment - Additional Information –COR-030409–
Date: Thursday, September 14, 2017 4:16:00 PM

Dear Mr. Ahrens,

Thank you for the follow up information concerning Rexnord's construction plans.

EPA still remains very concerned about the removal of wells that have been valuable in evaluating groundwater conditions and potential source area contributions. If Rexnord removes those wells, it will be proceeding at its own risk.

Although the logistics of preserving and protecting wells may prove difficult, steps can be taken to avoid creating conduits for contamination. In particular, it would be important to do whatever is possible to preserve and retain existing wells OV-51, MW276I, OV1-1, RMW-3D, and BD2D (even if only until construction Phase 2 in some cases). Not only could that avoid the need for re-drilling wells, but it would assure comparability and consistency for further sampling. If the wells must be replaced, comparable new wells should be placed as close to the previous locations as possible. EPA would also expect that for at least those five well locations, any replacement wells would be in place by 2018 even if construction otherwise falls behind schedule.

EPA is requesting to see a written plan identifying project locations for replacement wells; an explanation for why abandonment is the only feasible option; and a written commitment for the number and types of replacement wells to be installed. EPA also continues to believe that Rexnord should be willing to evaluate and discuss use of potential in-situ treatment measures during the period where the hotspot locations will be more accessible.

Please feel free to give me a call if you would like to discuss this further.

Thank you,

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From: Charles.Ahrens@ghd.com [mailto:Charles.Ahrens@ghd.com]
Sent: Friday, September 08, 2017 5:02 PM

To: Blake, Leslie <Blake.Leslie@epa.gov>

Cc: Gahala, Amy <Gahala.Amy@epa.gov>; Amy Gahala (agahala@usgs.gov) <agahala@usgs.gov>; Tom Frost <Thomas.Frost@rexnord.com>; Mark Bilut (mbilut@mwe.com) <mbilut@mwe.com>; kelli.taffora@rexnord.com; Ron.Frehner@ghd.com; cctofiling@croworld.com

Subject: Rexnord Well Abandonment - Additional Information ~COR-030409~

Hi Leslie,

In reference to our call yesterday, the attached letter provides additional information regarding well replacement, recent soil analytical results, and groundwater VOC results for MW279I. Please contact me if you have any questions regarding this information.

Thank you,

Chuck

Charles Ahrens

GHD

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